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7 Attorneys for Defendant  
VIRTUAL GUARD, INC.

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 DAWN YOSEF, an individual,  
12 Plaintiff,

13 v.

14 VIRTUAL GUARD, INC.;  
15 EMPLOYEE(S)/AGENT(S) DOES I-X; and  
16 ROE CORPORATIONS XI-XX, inclusive,  
17 Defendant.  
18

Case No. 2:21-cv-02052-RFB-VCF

**STIPULATION AND [PROPOSED]  
ORDER TO DISMISS ENTIRE ACTION  
WITH PREJUDICE**

19  
20 Plaintiff DAWN YOSEF (hereinafter “Plaintiff”) and Defendant, VIRTUAL GUARD, INC.  
21 (“Defendant”) (collectively “the parties”), by and through their respective attorneys of record, hereby  
22 stipulate and agree to the dismissal of this action in its entirety, with prejudice, with each party to bear  
23 its own costs and attorneys’ fees.

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4865-4450-7667.1 / 111656-1002

1 The parties agree that neither party shall be deemed to be a prevailing party in this action, and  
2 that neither party will file for an award of attorneys' fees or costs pursuant to any rule, statute, or law,  
3 whether local, state, or federal, in any forum that would be available.

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5 Dated: March 22, 2022

Dated: March 22, 2022

6 GABROY LAW OFFICES

LITTLER MENDELSON P.C.

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9 /s/ Christin Gabroy  
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16 Attorneys for Plaintiff  
17 DAWN YOSEF



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Attorneys for Defendant  
VIRTUAL GUARD, INC.

18  
19 IT IS SO ORDERED:

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21   
22 **RICHARD E. BOULWARE, II**  
23 **United States District Court**

24 DATED: March 23, 2022.  
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